



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

Mountain  
Plains  
Region

1244 Speer Boulevard  
Denver, CO 80204

JUL 7 1992

Reply to  
Attn. of:

SP 92-204  
CACFP-307  
SFSP-172

Subject:

Documentation of Free and Reduced Price Meal Eligibility for Homeless Children and Adults

To:

STATE AGENCY DIRECTORS  
(Special Nutrition Programs)

- Colorado ED, Colorado DH, Colorado SS,  
Iowa, Kansas, Missouri ED, Missouri DH,  
Montana OPI, Montana DHES, Nebraska ED,  
Nebraska SS, North Dakota, South Dakota,  
Utah, Wyoming ED, and Wyoming DHSS

This memorandum conveys guidance on two issues which were raised in response to our earlier memorandum on the above subject, dated April 17, 1992 (numbered SP 92-192, CACFP 294 and SFSP 160).

First, while the April 17 memorandum used the term "children" when speaking of child nutrition participants, the Agency believes that in addition the memorandum should apply to homeless adults who are enrolled in adult day care centers participating in the Child and Adult Care Food Programs. The Agency is aware, in fact, that this situation does exist and, therefore, we are extending this policy to such adults through this memorandum.

Second, it has been brought to our attention that FNS Instruction 765-2, which sets out the procedure by which officials may complete and approve free and reduced-price applications on behalf of their participants, states that this procedure is intended for use in pricing programs only. By limiting use of this optional procedure to pricing programs, FNS Instruction 765-2 has the effect of precluding use of this procedure by most child care and adult day care centers, since most of these are nonpricing programs. Officials of those nonpricing programs which serve homeless children and adults would thus appear to be prohibited from utilizing the eligibility determination process established in our April 17 memorandum.

When FNS Instruction 765-2 was implemented, its applicability was restricted to pricing programs because the benefits resulting from action of local program officials permitted under it accrue to the child and his or her family. It was not extended to nonpricing programs because the benefit accrues to the school or institution. In the latter situation, the possibility of fraud or abuse increases significantly.

In spite of the fact that the April 17 memorandum and the referenced Instruction deal with much the same issue, we believe that the policy established in the memorandum should be considered separate from that established in the Instruction. The memorandum recognizes the particular status of homeless children and adults and is a special effort on our part to assist them in meeting their nutritional needs. The Agency believes that the potential for abuse is of such limited scope that it is far outweighed by the need to reduce the complications which face homeless persons, as well as those who operate institutions which serve the homeless population. Therefore, local program officials (of pricing and nonpricing programs) may complete applications on behalf of, and approve free meals for, their homeless participants. Also, as provided in the April 17 memorandum, a list of homeless participants which includes specified information may be retained as documentation of free meal eligibility determination by the official when large numbers of homeless children and/or adults make it impractical for the official to complete individual applications.

If you have any questions on this matter, please contact our office.

*Ann C. Hector*

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Regional Director  
Special Nutrition Programs